

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

CONSERVATION LAW FOUNDATION,  
INC.

Plaintiff,

V.

SCHNITZER STEEL INDUSTRIES, INC.  
and SCHNITZER PUERTO RICO, INC.,

Defendants

Case No. 3:22-cv-01087-ADC

## **JOINT MOTION FOR EXTENSION OF TIME TO SERVE COMPLAINT**

Pursuant to Local Rule 6 and Fed. R. Civ. P. 6(b), Plaintiff Conservation Law Foundation (“CLF” or “Plaintiff”) and Defendants Schnitzer Steel Industries, Inc. and Schnitzer Puerto Rico, Inc. (collectively, “Schnitzer” or “Defendants”), respectfully submit this Joint Motion for a 90-day extension of the deadline for CLF to serve the Summons, Complaint and Civil Case Opening Documents on Defendants. The deadline for service by CLF on Defendants is currently May 23, 2022. If granted by the Court, this motion would reset the deadline for service by CLF on Defendants to August 22, 2022.

The parties have good cause for seeking an extension of time for service under Local Rule 6 and Fed. R. Civ. P. 6(b), as they are in ongoing negotiations in an effort to resolve or narrow the issues in the above-captioned case.

May 19, 2022

*Respectfully submitted,*

CONSERVATION LAW FOUNDATION,  
INC.

SCHNITZER STEEL INDUSTRIES, INC.  
SCHNITZER PUERTO RICO, INC.

By its attorneys:

By its counsel:

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### **CERTIFICATE OF SERVICE**

I hereby certify that on May 19, 2022, the foregoing joint motion was filed through the ECF system, by which means a copy of the filing will be sent electronically to all parties registered with the ECF system.

/s/ Miguel Sarriera-Román  
Miguel Sarriera-Román